



Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036-6797
+1 212 698 3500 Main
+1 212 698 3599 Fax
www.dechert.com

MAY CHIANG

may.chiang@dechert.com
+1 212 649 8734 Direct
+1 212 698 0441 Fax

March 27, 2024

VIA ECF

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: Moore, et al. v. Rubin, et al., 1:17-cv-06404 (BMC)

Dear Judge Cogan,

On behalf of Defendant Howard Rubin, we write in response to Plaintiffs' letter dated March 26, 2024 (Dkt. 426). We consent to the briefing schedule proposed by Plaintiffs' counsel, and respectfully request that the Court order that Plaintiffs' FRCP 54(d)(2) motion for attorney's fees extends Mr. Rubin's time to appeal the judgment until 30 days after the Court rules on the motion, consistent with FRCP 58(e).

Respectfully submitted,

/s/ May K. Chiang

May K. Chiang

Counsel to Defendant Howard Rubin

cc: All parties by ECF